DECLARATION OF JOSEPH B. WIDMAN

I, Joseph B. Widman, declare as follows:

A. Introduction

1. I am a former Assistant United States Attorney ("AUSA") in the United States Attorney's Office for the Central District of California ("USAO"). I joined the USAO in 2007, was promoted to deputy chief of the Riverside Branch Office in June 2012, was promoted to chief of the Riverside Branch Office in January 2014, and left the USAO in September 2020. This declaration does not purport to set forth all of my knowledge of or investigation into United States v. Julio Cesar Ramirez, ED CR 11-051-VAP (the "Ramirez case"), or United States v. John Jacob Olivas, ED CR 18-231-JGB (the "Olivas case"). I write this declaration based primarily on my memory and a few documents shown to me by the prosecutors currently assigned to the Olivas case. I have not reviewed my contemporaneous USAO emails from the periods in question. If called to do so, I would and could competently testify to the matters contained herein.

B. The Ramirez Case

- 2. I was the AUSA who investigated, charged, and resolved through guilty plea and sentencing the prosecution titled <u>United</u> States v. Julio Cesar Ramirez, ED CR 11-051-VAP.
- 3. As part of my investigation into misconduct allegations against various law enforcement officers and confidential informants involved in the Ramirez case, my memory is that I interviewed Olivas in or about December 2012 regarding the allegations made about him in the Ramirez case. I find it implausible that I would have asked Olivas about his relationship history beyond what was alleged about him in the Ramirez case, although I have very little independent

recollection of this/these conversation(s). I never had any personal relationship with Olivas; my relationship with him was strictly professional.

4. I do not recall talking about the <u>Ramirez</u> case with AUSAs Eli Alcaraz, Julius Nam, or Frances Lewis at any point before my discussion of this declaration with AUSA Alcaraz.

C. The Olivas Case

- 5. I recall that the FBI first approached then-AUSA Jay
 Robinson regarding a civil rights investigation of Olivas sometime in
 2014. At that time, AUSA Robinson was an AUSA and deputy chief of
 the Riverside Branch Office.
- 6. Sometime in 2016, after AUSA Robinson had been transferred to the USAO's National Security Division following the December 2, 2015 terrorist attack in San Bernardino, at the direction of USAO management, most of AUSA Robinson's Riverside Branch matters were reassigned to colleagues in Los Angeles or given to me to reassign within the Riverside Branch. The Olivas investigation was one of the matters I became responsible for as chief of the Riverside Branch. This is consistent with a document I have seen showing that I received some Olivas-related materials from FBI Special Agent David Staab in August 2016.

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7. My recollection is that, throughout 2016, the Olivas investigation was inactive while Olivas was serving a state prison sentence. I believe we (FBI and USAO) wanted to see how much of his state prison sentence he actually ended up serving before deciding whether to pursue potential federal charges. I recall that, after Olivas finished his state sentence, in or about 2017, I began actively working with FBI to conclude the federal investigation into Olivas and decide whether to pursue federal charges. When we indicted the case in 2018, I was the lead prosecutor.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Victorville, California, on October 26, 2021.

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